

GOETZ & ECKLAND
CIVIL LITIGATION AND CRIMINAL DEFENSE

November 15, 2024

Via eFile and eServe

Via ECF File/Serve
The Honorable Ann D. Montgomery
The Honorable Douglas L. Micko
United States District Court
300 South Fourth Street
Minneapolis, MN 55415

Re: Carsten J. Quinlan v. Daniel Puls, Cheryl Puls and Alissa Puls
Court File No.: 0:24-cv-03990

Dear Judge Montgomery and Magistrate Micko,

Pursuant to D. Minn. Local Rule 7.1(f)(1)(D), the undersigned counsel on behalf of Defendants Daniel Puls, Cheryl Puls, and Alissa Puls, request permission to file a longer than otherwise authorized dispositive motion for the following reasons:

1. The Complaint filed in the case alleges 14 causes of action, including allegations of defamation. The defamation allegations raise an issue under Minn. Stat. § 554.07-.20 requiring detailed briefing.
2. Jurisdictional issues and the barring of certain claims due to the applicable statute of limitations must also be presented in Defendants' motion, which requires additional briefing.
3. Upon completion of the research, undersigned counsel concluded that these issues cannot be properly presented to the Court in 12,000 words, or less, in accordance with D. Minn. Local Rule 7.1(f)(1)(A) for Defendants' dispositive motion.

Counsel respectfully requests permission to exceed the word limits set by D. Minn. Local Rule 7.1(f)(1)(D) and submit a brief of not more than 20,000 words. Thank you, Your Honors.

Sincerely,

GOETZ & ECKLAND P.A.

By _____



Alan P. King (0344059)

The Honorable Ann D. Montgomery and Douglas L. Micko

November 15, 2024

Page 2

APK/mjs

cc: Daniel Puls, Cheryl Puls and Alissa Puls
Carsten J. Quinlan – via ECF